

Exhibit D

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Ladelia Hampton, as next of friend and mother of one minor child, T.H., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Ladelia Hampton has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.H. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

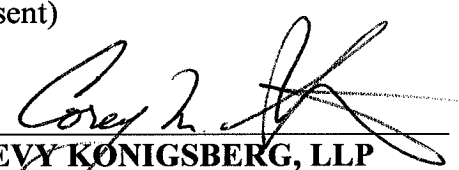
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Lachandra Griggs, as next of friend and mother of four minor children, J.G.1, J.G.2, T.B. and T.G., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Lachandra Griggs has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.G.1 – [REDACTED] 2000, T.B. – [REDACTED] 2001, J.G.2 – [REDACTED] 2002, T.G. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Lacey Case, as next of friend and mother of two minor children, C.H. and R.H., [REDACTED] Flint, MI 48502, claimant's counsel can be contacted at 212-605-6200. Lacey Case has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.H. – [REDACTED] 2014, R.H. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kyrie Morgan, as next of friend and mother of two minor children, D.M. 1 and D.M. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Kyrie Morgan has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.M.1 – [REDACTED] 2013, D.M.2 – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kyna Edwards, as next of friend and mother of two minor children, C.G. and K.G., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Kyna Edwards has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.G. – [REDACTED] 2013, K.G. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Krystal Dismuke, as next of friend and mother of two minor children, K.P. 1 and K.P. 2, [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Krystal Dismuke has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.P.1 – [REDACTED] 2010, K.P.2 – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kristy Thomas, as next of friend and mother of three minor children, H.D., W.M. and Z.M., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Kristy Thomas has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: H.D. – [REDACTED] 2003, W.M. – [REDACTED] 2010, Z.M. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

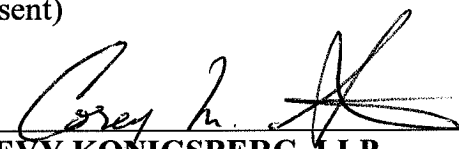
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kristy Jackson, as next of friend and mother of two minor children, J.J. and O.C., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Kristy Jackson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.J. – [REDACTED] 2001, O.C. – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Koreatha Sanders, as next of friend and mother of four minor children, D.J., K.W.1, K.W.2 and K.C., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Koreatha Sanders has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.J. – [REDACTED] 2010, K.W.1 – [REDACTED] 2007, K.W.2 – [REDACTED] 2006, K.C. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

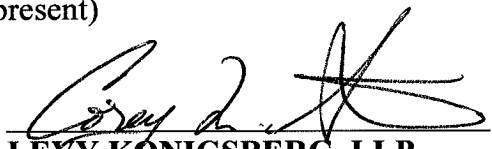
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kokeeta Jones, as next of friend and mother of one minor child, T.H., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kokeeta Jones has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.H. – [REDACTED]04

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kizzy Miles, as next of friend and mother of two minor children, K.H.1 and K.H.2, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Kizzy Miles has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.H.1 – [REDACTED] 2005, K.H.2 – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kirklynn Briggs, as next of friend and mother of one minor child, S.E., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kirklynn Briggs has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.E. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

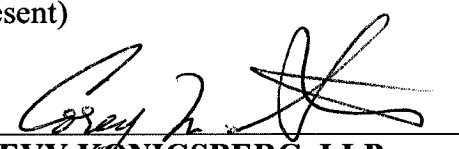
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kira Willingham, as next of friend and mother of two minor children, S.W. And T.W., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Kira Willingham has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.M. – [REDACTED] 2010, S.W. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

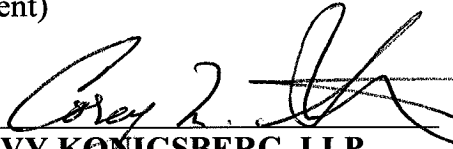
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kira Barnes, as next of friend and mother of two minor children, E.B. and P.B., [REDACTED] Grand Blanc, MI 48439, claimant's counsel can be contacted at 212-605-6200. Kira Barnes has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.B. – [REDACTED] 2011, P.B. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kimberly Williams, as next of friend and mother of one minor child, Z.S., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Kimberly Williams has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: Z.S. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kimberly Hoffman, as next of friend and mother of two minor children, E.H. and J.H., [REDACTED] Au Gres, MI 48703, claimant's counsel can be contacted at 212-605-6200. Kimberly Hoffman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.H. – [REDACTED] 2003, J.H. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

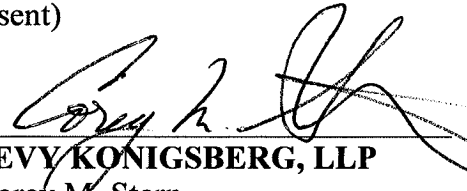
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kimberly Gaddy, as next of friend and mother of three minor children, K.G. 1, K.G. 2 and D.G., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Kimberly Gaddy has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.G.21 – [REDACTED]1999, D.G. – [REDACTED]2001, K.G.1 – [REDACTED]2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kimberly Frost, as next of friend and mother of two minor children, G.L. and C.F., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kimberly Frost has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.F. – [REDACTED] 2014, G.L. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kimberly Davis, as next of friend and mother of one minor child, D.T., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kimberly Davis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.T. – [REDACTED] 1998

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Keyla Cooper, as next of friend and mother of four minor children, R.R., A.R., K.R. and D.C., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Keyla Cooper has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.R. – [REDACTED] 2005, R.R. – [REDACTED] 2003, D.C. – [REDACTED] 2000, K.R. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

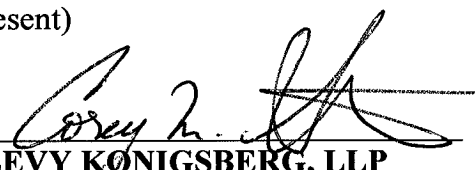
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kevin Holland, as next of friend and father of one minor child, E.N., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kevin Holland has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.N. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

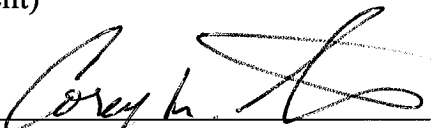
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Keri Jo Wells, as next of friend and mother of two minor children, J.W. and T.W., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Keri Jo Wells has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.W. – [REDACTED] 2016, T.W. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Keona Taylor, as next of friend and mother of two minor children, N.T. and N.H., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Keona Taylor has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.T. – [REDACTED] 2013, N.H. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

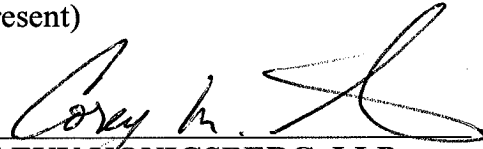
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kenyun Pittman, as next of friend and mother of one minor child, P.P., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Kenyun Pittman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: P.P. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kenyrda Houston, as next of friend and father of two minor children, K.H.1 and K.H.2, [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kenyrda Houston has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.H.1 – [REDACTED] 2005, K.H.2 – [REDACTED] 1999

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kenyetta Waterford, as next of friend and mother of three minor children, D.G., K.W. and G.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Kenyetta Waterford has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.G. – [REDACTED] 2007, G.W. – [REDACTED] 2015, K.W. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

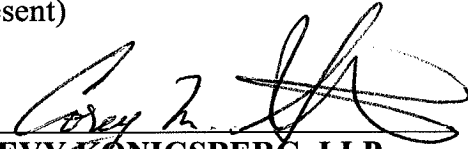
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kenya Franklin, as next of friend and mother of two minor children, Z.B. and J.F., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Kenya Franklin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.F. – [REDACTED] 2016, Z.B. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kendralia Sweeney, as next of friend and mother of two minor children, D.B. and M.B., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Kendralia Sweeney has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.B. – [REDACTED] 2011, M.B. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

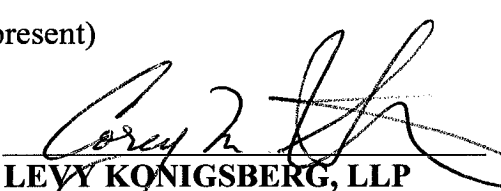
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kenchelle Bedenfield, as next of friend and mother of four minor children, A.P., C.P., K.B. and G.P., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Kenchelle Bedenfield has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.P. – [REDACTED] 2016, C.P. – [REDACTED] 2013, G.P. – [REDACTED] 2014, K.B. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Keith Horton, as next of friend and father of two minor children, K.H. and K.C., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Keith Horton has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.C. – [REDACTED] 2013, K.H. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Keisha Smith, as next of friend and mother of one minor child, T.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Keisha Smith has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.W. – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: KeiArah Green, as next of friend and mother of one minor child, E.R., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. KeiArah Green has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.R. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

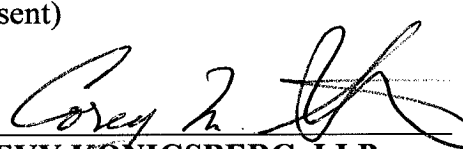
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Keanion Randolph, as next of friend and mother of three minor children, A.J., D.J. and J.R., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Keanion Randolph has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.J. – [REDACTED] 2006, J.R. – [REDACTED] 2008, D.J. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Keaira Love, as next of friend and mother of one minor child, L.W., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Keaira Love has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.W. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

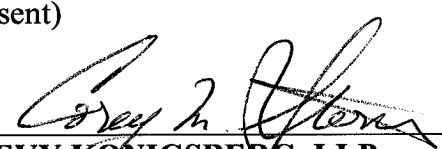
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kayairra Beard, as next of friend and mother of two minor children, E.L. 1 and E.L. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Kayairra Beard has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.L.1 – [REDACTED] 2014, E.L.2 – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

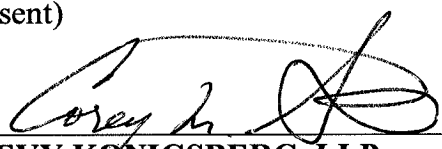
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Katrina Strong, as next of friend and mother of three minor children, K.P.1, K.P.2 and K.P.3, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Katrina Strong has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.P.1 – [REDACTED] 2004, K.P.2 – [REDACTED] 2005, K.P.3 – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: KataRa Sealey, as next of friend and mother of two minor children, K.S. and M.S., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. KataRa Sealey has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.S. – [REDACTED] 2001, M.S. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Karen Morgan, as next of friend and mother of three minor children, A.M. 1, A.M. 2 and A.S., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Karen Morgan has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.M.1 – [REDACTED] 2004, A.S. – [REDACTED] 2009, A.M.2 – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

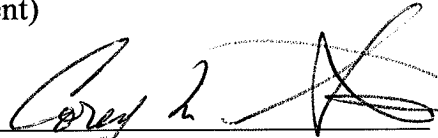
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Karen Bennett, as next of friend and mother of one minor child, D.R., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Karen Bennett has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: D.R. – [REDACTED] 2005
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kapresha Barber, as next of friend and mother of three minor children, J.B., K.B. and T.H., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Kapresha Barber has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.B. – [REDACTED] 2006, K.B. – [REDACTED] 2008, T.H. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kanisha Holmes, as next of friend and mother of one minor child, D.S., [REDACTED] Davison, MI 48423, claimant's counsel can be contacted at 212-605-6200. Kanisha Holmes has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.S. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

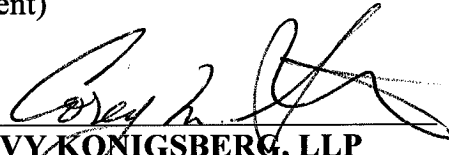
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

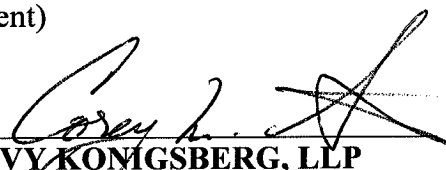
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Kamesha Westbrook, as next of friend and mother of two minor children, J.T. 1 and J.T. 2, [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kamesha Westbrook has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: J.T. – [REDACTED] 2008, J.J. – [REDACTED] 2013
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Kamala Blount, as next of friend and mother of two minor children, K.B. 1 and K.B. 2, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Kamala Blount has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: K.B.1 – [REDACTED] 2005, K.B.2 – [REDACTED] 2005
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kaitlyn Tobin, as next of friend and mother of one minor child, K.B., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Kaitlyn Tobin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.B. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

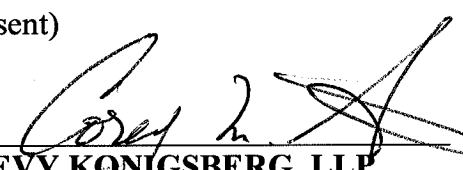
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Kadeja Smith, as next of friend and mother of two minor children, J.L. and J.B., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Kadeja Smith has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: J.B. – [REDACTED] 2015, J.L. – [REDACTED] 2012
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Kacetta Gear, as next of friend and mother of two minor children, K.G. 1 and K.G. 2, [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Kacetta Gear has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.G.1 – [REDACTED] 2004, K.G.2 – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

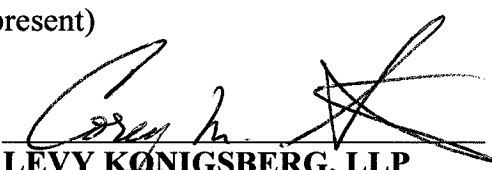
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Justis Gonzales, as next of friend and mother of one minor child, L.B., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Justis Gonzales has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.B. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Justine Leibing, as next of friend and mother of one minor child, K.A., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Justine Leibing has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.A. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Junetta Christian, as next of friend and mother of two minor children, K.C. and S.C., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Junetta Christian has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.C. – [REDACTED] 2009, S.C. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Juana Jones, as next of friend and mother of two minor children, A.J.1 and A.J.2, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Juana Jones has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.J. – [REDACTED] 2009, A.J. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/22/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM